

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

MAXIE MCNABB,)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACTION NO. 2:06cv664-MHT
)	
SANDERS LEAD COMPANY, INC.,)	
)	
Defendant.)	

DEFENDANT’S REQUESTED VOIR DIRE QUESTIONS

Pursuant to the Federal Rules of Civil Procedure and the and the Uniform Scheduling Order entered by this Honorable Court, Defendant Sanders Lead Company, Inc. (“Defendant”), by counsel, hereby formally requests additional questions be propounded to the potential jury pool in addition to the standard questions asked. The questions the Defendant requests be added are as follows:

1. Do you personally know the Plaintiff, Maxie McNabb. If so, please indicate how you know Mr. McNabb.
2. Have you or any member of your family ever been employed by Sanders Lead Company, Inc. of Troy, Alabama or any Sanders affiliated company? If so, please indicate what dates you were employed, what your position is or was and if applicable, how you came to be no longer employed at Sanders Lead Company, Inc or any Sanders affiliated company.
3. Are you acquainted with any person who is or who has ever been employed by Sanders Lead Company, Inc. of Troy, Alabama or any Sanders affiliated company? If so, please indicate who and your

relationship to said individual.

4. Have you ever felt like you were discriminated against for any reason at any current or past place of employment? If so, please describe what happened in detail.
5. Have you or any member of your family or any friend or any associate ever been acquainted with Roderick Cooks or Lee Winston, the attorneys for the Plaintiff in this matter?

WHEREFORE, the Defendant respectfully requests that these questions be added to the voir dire questionnaire that is to be used in this matter.

Respectfully submitted, this the 12th day of November, 2007.

s/ N.J. Cervera

N.J. Cervera (CER001)
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CERTIFICATE OF SERVICE

I hereby certify that I have this date electronically filed the foregoing with the Clerk of Court using the CM/ECF system and served a copy of same by CM/ECF on this the 12th day of November, 2007:

Roderick T. Cooks, Esq.
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s/ N.J. Cervera
OF COUNSEL